

EXHIBIT 77

1
2 UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

3 -----x
4 NATIONAL COALITION ON BLACK CIVIC
PARTICIPATION, MARY WINTER, GENE
5 STEINBERG, NANCY HART, SARAH WOLFF,
KAREN SLAVEN, KATE KENNEDY, EDA
6 DANIEL, and ANDREA SPERES,

7 Plaintiffs,

8 - against -

Civil Action No.
10-cv-8668

9
10 JACOB WOHL, JACK BURKMAN, J.M.
BURKMAN & ASSOCIATES, LL, PROJECT
11 1599, and JOHN and JANE DOES 1-10,
12 Defendants.

-----x

13
14 Remote deposition
15 May 11, 2022
16 10:08 a.m.

17
18
19 VIDEO-RECORDED VIDEOCONFERENCE DEPOSITION of
20 JACOB WOHL, before Michele Moskowitz, a shorthand
21 reporter and Notary Public of the State of New
22 York.
23
24
25

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ALSO PRESENT:

MIRIAM LI, LEGAL ANALYST

RYAN GALLAGHER, VIDEOGRAPHER

1 WOHL

2 A. Fifth Amendment.

3 Q. Now, you're taking the Fifth
4 Amendment -- okay. Strike that.

5 You've seen this document before
6 because you drafted this document, correct?

7 MR. KLEINMAN: Objection.

8 A. Fifth Amendment.

9 Q. Okay.

10 MR. SAWYER: Let's scroll down a
11 couple of pages. Okay, stop here.

12 Q. So these are -- this is -- these are
13 more pages from the same PDF produced to us in
14 discovery by defendants, Defendants' 4339 through
15 4340, and this is an updated version of which --
16 what we just read, but it's in a prospectus form.
17 Are you familiar with this document?

18 MR. KLEINMAN: Objection.

19 A. Fifth Amendment.

20 Q. In fact, you are familiar with this
21 document because you drafted this document,
22 correct?

23 MR. KLEINMAN: Objection.

24 A. Fifth Amendment.

25 Q. And when this document was released

1 WOHL

2 Q. And that's also true, you admitted to
3 The Post that you were the author of the draft
4 plan for the Arlington Center for Political
5 Intelligence and you purposefully misled The
6 Daily Beast about its -- about your authorship
7 because you believed that they would not write
8 about it otherwise, correct?

9 MR. KLEINMAN: Objection.

10 A. Fifth Amendment.

11 Q. You said that to The Post reporter
12 and they accurately reported it, correct?

13 MR. KLEINMAN: Objection.

14 A. Fifth Amendment.

15 Q. Okay. Thank you.

16 MR. SAWYER: And, Miriam, do we have
17 the exhibit number for that one?

18 MS. LI: Now that it's off the
19 screen, I can check.

20 MR. SAWYER: I'm sorry, Madam Court
21 Reporter, I realize now that I never
22 indicated when we were off confidential. If
23 we can -- if we can, without objection from
24 Randy of course, go off confidential
25 starting with when we returned from the

C E R T I F I C A T I O N

STATE OF NEW YORK)

)

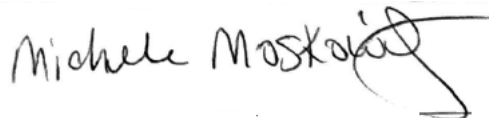
COUNTY OF NEW YORK)

I, MICHELE MOSKOWITZ, a Shorthand Reporter
and Notary Public within and for the State of New
York, do hereby certify:

That JACOB WOHL, the witness whose
examination is hereinbefore set forth, was duly
sworn/affirmed by me and that this transcript of
such examination is a true record of the
testimony given by such witness.

I further certify that I am not related to
any of the parties to this action by blood or
marriage and that I am in no way interested in
the outcome of this matter.

IN WITNESS WHEREOF, I have hereunto set my
hand this 16th day of May, 2022.



MICHELE MOSKOWITZ